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*Attorneys for Defendant*  
R&G HOLDINGS, LLC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOHN MEGGS,

Plaintiff,

v.

R&G HOLDINGS, LLC, LE PRIVE  
HOSPITALITY, LLC and SHINJUKU, LLC

Defendants.

Case No. 2:23-cv-01051-APG-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT R&G HOLDINGS, LLC TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT  
(First Request)**

Defendant R&G HOLDINGS, LLC, by and through its counsel of record, the law firm HOLLEY DRIGGS, and Plaintiff JOHN MEGGS, by and through his counsel of record, the law firms the LAW OFFICES OF ROBERT P. SPRETNAK and GARCIA-MENOCAL & PEREZ, P.L. (*Pro Hac Vice*) hereby stipulate as follows:

R&G HOLDINGS, LLC's response to Plaintiff's Complaint (ECF No. 1) is currently due September 5, 2023. R&G Holdings, LLC requests additional time to investigate the claims made in Plaintiff's Complaint and defenses thereto. The parties stipulate that Defendant R&G HOLDINGS, LLC may have an extension of time to file a responsive pleading to Plaintiff's Complaint up and through September 26, 2023.

This is the parties' first request for an extension of R&G HOLDINGS, LLC's time to respond to Plaintiff's Complaint and is made in good faith and not for any purposes of delay.

**STIPULATED AND AGREED BY ALL PARTIES.**

Dated: August 30, 2023.

By: /s/ Jason D. Smith

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Jessican M. Lujan (NV Bar No. 14913)

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**ORDER**

**IT IS SO ORDERED**

**DATED:** 2:08 pm, September 01, 2023



**BRENDA WEKSLER**

**UNITED STATES MAGISTRATE JUDGE**